
ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13
	:	

DEBTORS OBJECTION TO THE RELIEF FROM STAY FILED BY WILMINGTON TRUST, NATIONAL ASSOCIATION,
NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2016-1

AND NOW, comes Debtor, Allen Windrim, and files the within Answer's and allege as follows:

1. Debtor, is in receipt of a notice of hearing date and time which was prepared by the court on January 23, 2019 and nothing else was enclosed or mailed to the Debtor.
2. Debtor, has never received a motion or filing by the moving party of their intentions why they are seeking on Order for Relief From Stay.
3. Debtor is without sufficient information to properly defend, answer or Object to Relief From Stay.
4. Debtor, has not received any details from the moving party regarding the collateral for which they are seeking Relief From Stay on; no description, documents to support the current value, any supporting documents to support the amount of the original loan, the original monthly payment, the amount of the arrears, nor what the current monthly payment is.
5. There is proof as to who holds the current mortgage or in what capacity they are operating for the debtor or the collateral in question.
6. Debtor, was not provide with adequate notice of the hearing date and time. Debtor was provide with approximately ten (10) days notice, which is nowhere near adequate.
7. The Debtor has not even had a confirmation hearing to determine if the proposed plan is accepted or if an amended plan will need to be submitted for approval to the Honorable Court.
8. Debtor, has been denied any/all levels of cooperation, assistance or even respect from all moving parties, assigned companies on the part of the moving parties and all hired lawyers and law firms for the moving parties; regardless of the fact that the Debtor is Pro Se and all lawyers and law firms are

WHEREFORE, Debtor, Allen Windrim, respectfully requests that this Honorable Court enter an Order in response to the Debtor's Motion for:

(1) A request of a continuance to file an Objection to the Relief Of Stay filed;

- and -

(2) Not dismissing the Debtor's current case;

and

(3) Issuing a stay of all pending motion's in order to file responses, accordingly;

and

(4) Issue an Order directing the moving party to properly serve Debtor with a sufficient motion with supporting documents.

Respectfully Submitted:



Allen Windrim, Pro Se,
Debtor

Dated: 28th January 2019



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T STATEMENT OF ACCOUNT



ALLEN WINDRIM
ESCROW ACCOUNT
2244 S 9TH ST
PHILADELPHIA PA 19148-3143

Page: 1 of 2
Statement Period: Oct 30 2018-Dec 31 2018
Cust Ref #: [REDACTED]
Primary Account #: [REDACTED] 8175



TD Simple Savings

ALLEN WINDRIM
ESCROW ACCOUNT

Account # [REDACTED] 8175

ACCOUNT SUMMARY

Beginning Balance	0.00	Interest Earned This Period	0.21
Deposits	3,137.37	Interest Paid Year-to-Date	0.21
Other Credits	0.21	Annual Percentage Yield Earned	0.05%
		Days in Period	63
Ending Balance	3,137.58		

DAILY ACCOUNT ACTIVITY

Deposits

POSTING DATE	DESCRIPTION	AMOUNT
10/31	DEPOSIT	1,045.79
11/01	DEPOSIT	1,045.79
12/07	DEPOSIT	1,045.79
	Subtotal:	3,137.37

Other Credits

POSTING DATE	DESCRIPTION	AMOUNT
11/30	INTEREST PAID	0.09
12/31	INTEREST PAID	0.12
	Subtotal:	0.21

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